

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

ADAM G. ROSENBERG, ESQ, LLC

Adam G. Rosenberg, Esq

70 S. Main Street, Floor 2

Cranbury, NJ 08512

(732)529-6700

arosenbergesq@gmail.com

Attorney of Brian W. Mead

Adversary Attorney

In Re:

Brian W. Mead,

Debtor.

Case No.: 21-17470

Chapter: 7

Judge: KCF

**DEBTOR'S OBJECTION TO NOTICE OF PUBLIC SALE**

1. I am the Debtor in the above captioned matter.
2. On July 24, 2024 the Trustee in this matter filed a Notice of Proposed Sale for the property located at 116 Hale Avenue White Plains, New York.
3. The sale is scheduled to be conducted via auction, and is scheduled to take place on September 19, 2024.
4. I am half owner of the property on Hale Avenue, and my spouse owns the other half of the property. She relies on the rental income to pay her expenses.
5. Upon learning of the timing of the proposed sale, I was contacted by my daughter, and discussed that she would be able to borrow money from a lender to be able to purchase the portion of the real property belonging to me as the debtor.
6. My daughter requires time to be able to work through the process and show proof and ability to pay for the property, prior to any listed auction that is proposed to take place.

7. I am filing this objection as I believe if given additional time, I can resolve the issues with my creditors and possibly avoid the sale of the property. Additionally, I am expecting my daughter to be able to borrow funds and offer the Trustee the equivalent of what would be generated from an auction.
8. I am a senior citizen with limited income, who has already faced significant challenges due to the loss of his entire estate. The sale of this property at this time would further exacerbate the financial hardship and disruption to my personal and professional life.
9. Two of my creditors, RW BARNABAS Hospital and Inspira Medical both agreed to terms of a settlement, that provides for both companies to receive a 6-year payout of the settlement. The terms do not require the Trustee to complete payments of the claim identified.
10. I am in jeopardy of losing everything I worked for. My only income now, is between my Wife and my Social Security and a small monthly rental income. This financial situation has led to strain on my marriage and estrangement from my wife due to the challenges we are facing.
11. My petition should never have been filed, and I was not properly advised regarding the disclosures that were required. While I come before the Court in this position, I am hopeful that the Court will grant me the time necessary to resolve this issue and avoid the sale of the property.
12. Alternatively, this objection respectfully seeks that the Court adjourn the sale for a period of at least sixty (60) days to allow my counsel to finalize any settlement discussions with the other creditors, including the IRS. I am confident of a positive outcome if the Court can at the least adjourn the timing of the sale and allow my family to aid me in saving this property. My daughter is working with a lender and should be able to offer the Trustee an alternative arrangement that will not prejudice creditors.
13. Another reason for my objection is that the Internal Revenue Service (IRS) claim is currently under discussions, and the time requested for the adjournment will also give me time to finalize any settlements prior to the sale.
14. This IRS debt represents the largest and most significant portion of the Proof of Claim. I believe that additional time is necessary to properly address and negotiate this claim to potentially reduce its impact on my financial situation. The Proof of Claim referencing the Internal Revenue Service (IRS) claim against Brian Mead is being reviewed due to

the conversion of the unsecured portion of the IRS's claim, and would likely not be completed by the scheduled auction date of September 19, 2024.

15. In light of these circumstances, I respectfully request the Court to postpone the auction of the property at 116 Hale Ave, White Plains, NY, and allow me to completely explore alternative solutions that will be fair to my creditors, but allow me to preserve my property.

I certify under penalty of perjury that the above is true.

\_\_August 21, 2024\_\_\_\_\_  
Date

\_\_\_\_s/Brian Mead\_\_\_\_\_  
Brian Mead